

1 **BOIES SCHILLER FLEXNER LLP**

2 David Boies (admitted pro hac vice)
333 Main Street
3 Armonk, NY 10504
4 Tel: (914) 749-8200
dboies@bsflp.com

5 Mark C. Mao, CA Bar No. 236165
Beko Reblitz-Richardson, CA Bar No. 238027
6 Erika Nyborg-Burch, CA Bar No. 342125
44 Montgomery St., 41st Floor
7 San Francisco, CA 94104
Tel.: (415) 293-6800
8 mmao@bsflp.com
brichardson@bsflp.com
enyborg-burch@bsflp.com

9 James Lee (admitted pro hac vice)
10 Rossana Baeza (admitted pro hac vice)
11 100 SE 2nd St., 28th Floor
12 Miami, FL 33131
13 Tel.: (305) 539-8400
jlee@bsflp.com
rbaeza@bsflp.com

14 Alison L. Anderson, CA Bar No. 275334
15 725 S Figueroa St., 31st Floor
16 Los Angeles, CA 90017
17 Tel.: (213) 995-5720
alanderson@bsflp.com

18 **SUSMAN GODFREY L.L.P.**

19 Bill Carmody (admitted pro hac vice)
Shawn J. Rabin (admitted pro hac vice)
Steven M. Shepard (admitted pro hac vice)
Alexander Frawley (admitted pro hac vice)
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Tel.: (212) 336-8330
bcarmody@susmangodfrey.com
srabin@susmangodfrey.com
sshepard@susmangodfrey.com
afrawley@susmangodfrey.com

20 Amanda K. Bonn, CA Bar No. 270891
1900 Avenue of the Stars, Suite 1400
21 Los Angeles, CA 90067
Tel.: (310) 789-3100
abonn@susmangodfrey.com

22 **MORGAN & MORGAN**

23 John A. Yanchunis (admitted pro hac vice)
Ryan J. McGee (admitted pro hac vice)
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Tel.: (813) 223-5505
jyanchunis@forthepeople.com
rmcgee@forthepeople.com

24 Michael F. Ram, CA Bar No. 104805
711 Van Ness Ave, Suite 500
25 San Francisco, CA 94102
Tel: (415) 358-6913
mram@forthepeople.com

26 **UNITED STATES DISTRICT COURT**
27 **NORTHERN DISTRICT OF CALIFORNIA**

28 CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

vs.

GOOGLE LLC,
Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
GOOGLE'S MATERIAL SHOULD BE
SEALED

The Honorable Susan van Keulen

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs' Response to the Court's Order to Show Cause (Dkt. 784) ("Plaintiffs' Response").

Document Sought to Be Sealed	Party Claiming Confidentiality	Portions to be Filed Under Seal	Basis for Sealing
Plaintiffs' Response.	Google	Portions highlighted in yellow	Refers to Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
Exhibit 1 to the Declaration of Mark Mao.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
Exhibit 2 to the Declaration of Mark Mao.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
Exhibit 3 to the Declaration of Mark Mao.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
Exhibit 4 to the Declaration of Mark Mao.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
Exhibit 5 to the Declaration of Mark Mao.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order

1	Exhibit 6 to the Declaration of Mark Mao.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
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5	Exhibit 7 to the Declaration of Mark Mao.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
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7				
8	Declaration of Christopher Thompson.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
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10				
11	Declaration of Jay Bhatia.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
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14				

Under Civil Local Rule 79-5(f), Google, as the designating party, bears the burden of establishing that the designated material is sealable.

<divDDdivDated: January 20, 2023!!!!!!

BOIES SCHILLER FLEXNER LLP

By s/ Mark C. Mao

Mark C. Mao (CA Bar No. 236165)
mmao@bsflp.com
Beko Reblitz-Richardson (CA Bar No. 238027)
brichardson@bsflp.com
Erika Nyborg-Burch (CA Bar No. 342125)
enyborg-burch@bsflp.com
BOIES SCHILLER FLEXNER LLP
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Telephone: (415) 293 6858
Facsimile (415) 999 9695

David Boies (*pro hac vice*)

dboies@bsflp.com

BOIES SCHILLER FLEXNER LLP
333 Main Street
Armonk, NY 10504

1 Tel: (914) 749-8200

2 James W. Lee (*pro hac vice*)
jlee@bsfllp.com
3 Rossana Baeza (*pro hac vice*)
rbaeza@bsfllp.com
4 BOIES SCHILLER FLEXNER LLP
100 SE 2nd Street, Suite 2800
5 Miami, FL 33130
Telephone: (305) 539-8400
6 Facsimile: (305) 539-1304

7 Amanda Bonn (CA Bar No. 270891)
abonn@susmangodfrey.com
8 SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
9 Los Angeles, CA 90067
Telephone: (310) 789-3100

10 Bill Carmody (*pro hac vice*)
bcarmody@susmangodfrey.com
11 Shawn J. Rabin (*pro hac vice*)
srabin@susmangodfrey.com
12 Steven Shepard (*pro hac vice*)
sshepard@susmangodfrey.com
13 Alexander P. Frawley (*pro hac vice*)
afrawley@susmangodfrey.com
14 SUSMAN GODFREY L.L.P.
15 1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
16 Telephone: (212) 336-8330

17 John A. Yanchunis (*pro hac vice*)
jyanchunis@forthepeople.com
18 Ryan J. McGee (*pro hac vice*)
rmcgee@forthepeople.com
19 MORGAN & MORGAN, P.A.
201 N Franklin Street, 7th Floor
20 Tampa, FL 33602
Telephone: (813) 223-5505
21 Facsimile: (813) 222-4736

22 Michael F. Ram, CA Bar No. 104805
MORGAN & MORGAN
23 711 Van Ness Ave, Suite 500
San Francisco, CA 94102
24 Tel: (415) 358-6913
mram@forthepeople.com

25 *Attorneys for Plaintiffs*